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Counsel to Dalia Genger

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 7
	:	
ORLY GENDER,	:	Case No. 19-13895 (JLG)
	:	
Debtor.	:	

DEBORAH J. PIAZZA, as Successor CHAPTER 7	:	
TRUSTEE, of the Bankruptcy Estate of Orly Genger,	:	Adv. Pro. No. 21-ap-01180 (JLG)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
MICHAEL OLDNER, THE ORLY GENDER 1993	:	
TRUST, RECOVERY EFFORT INC., SAGI	:	
GENER, THE SAGI GENDER 1993 TRUST,	:	
DALIA GENDER, ELANA GENDER, DAVID	:	
PARNES, D&K GP LLC, TPR INVVESTMENT	:	
ASSOCIATES, INC., MANHATTAN SAFETY	:	
MAINE, INC. AND JANE DOES 1-100,	:	
	:	
Defendants.	:	

NOTICE OF APPEARANCE AND REQUEST FOR ALL NOTICES AND PLEADINGS

PLEASE TAKE NOTICE that Dalia Genger, by and through her undersigned counsel, hereby requests that all notices given or required to be given in the above-captioned adversary proceeding, and all papers served or required to be served in the above-captioned adversary

proceeding, including, without limitation, all notices pursuant to Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy Procedure, be served upon the following:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes notices of all applications, motions, petitions, and pleadings, and any other documents brought before the Court in this adversary proceeding, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, facsimile or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any prior or later appearance, pleading, claim, or suit shall waive any right of Dali Genger to (1) have final orders in non-core matters entered only after *de novo* review by a District Court judge, (2) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) any objection to the jurisdiction of the Bankruptcy Court for any purpose, (5) any election of remedy, or (6) any other right(s), claim(s), defense(s), setoff(s) or

recoupment(s), under agreements, in law, in equity, or otherwise, all of which are expressly reserved.

Dated: September 24, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Paul J. Labov

Paul J. Labov, Esq.

Beth E. Levine, Esq.

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